

1258-1342

8/5/2013

1/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 5 2013

Betzy Maldonado
Regulatory Services
Arch Chemicals Inc., Suite 1100
5600 New Northside Dr
Atlanta, GA 30328

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: AW35-36
EPA Reg.#: 1258-1342
Notification Date: July 15, 2013
Receipt Date: July 17, 2013

Dear Ms. Maldonado:

This acknowledges the receipt of your notification, submitted under the provision of PR Notice 98-10 and FIFRA section 3(c)9.

Proposed Notification:

Move a paragraph of the "PHYSICAL AND CHEMICAL HAZARDS" statement, "Contamination or improper use..." from page 3 to page 1. Revise the statement "If First Aid Statements are placed on front panel..." and add optional statement "Superscript Used in Lot Number" on page 1. Add "Sanitize it" graphic symbol and also add optional claims "Sanitizes & Prevents Algae", "Prevents Staining & Scaling Formation", and "Clarifies & Softens Water" on page 7 for "AW35-36" product label (EPA Reg# 1258-1342). Submitted proposed label dated July 10, 2013 (pin punch 7/17/13).

General Comment:

Based on the review of the material submitted, the notification noted above is **acceptable**.

This notification and this letter have been inserted in your file for future reference.

If you have further question on this letter, please contact David Liem at 703-305-1284 or by email at liem.david@epa.gov.

Sincerely

A handwritten signature in black ink, appearing to read "Demson Fuller".

Demson Fuller
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 1258-1342	2. EPA Product Manager Mike Mendelsohn	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) AW 35-36	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Arch Chemicals, Inc. (Arch is now owned by Lonza) 5660 New Northside Dr, NW, Suite 1100 Atlanta, GA, 30328 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Not Subject to PRIA

Label Notification to request the addition of new marketing language and graphic symbol. Refer to cover letter for details.

This notification is consistent with the provisions of PR-Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: B. Maldonado

Date: 7/15/13

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No <i>*Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container	4. Size(s) Retail Container various	5. Location of Label Direction <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Betzy Maldonado	Title Regulatory Specialist II	Telephone No. (Include Area Code) 678-627-2228
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <u>B. Maldonado</u>	3. Title Regulatory Specialist II	
4. Typed Name Betzy Maldonado	5. Date 7/15/13	

Via Fed Ex

Mr. Mike Mendelsohn, PM -32
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Arch Chemicals, Inc.
5660 New Northside Drive
Suite 1100
Atlanta, GA 30328
USA

Betzy Maldonado
Regulatory Services

Tel: 678-627-2228
Fax: 678-627-2081
betzy.maldonado@lonza.com

July 15, 2013

SUBJECT: AW35-36, EPA Reg. No. 1258-1342
Application for Label Notification

Dear Mr. Mendelsohn:

Arch Chemicals, Inc. is submitting an application to make the following changes to subject product label:

1. The paragraph starting with "Contamination" on page 3 was moved to page 1 for consistency and uniformity with all our labels.
2. On page 1:
 - The statement "If the First Aid Statements are placed on the front panel..." was revised.
 - Added the optional statement "Superscript Used in Lot number".
3. The following graphic symbol was added to page 7:



In addition, the following optional marketing claims were also added: "Sanitizes and Prevents Algae", "Prevents Stainig & Scaling Formation", and "Clarifies & Softens Water".

Please find enclosed the following documents in support of this notification:

- Application for Pesticide (8570-1)
- Certification with Respect to Label Integrity
- 1 copy of the proposed label with changes highlighted
- 1 CD with proposed label

If you have any questions or need any additional information, please feel free to contact me at 673-627-2228 or via e-mail at betzy.maldonado@lonza.com.

Sincerely,
Betzy Maldonado
Betzy Maldonado
Regulatory Services

Note to reviewer:

[Items in brackets [AAA] are optional and may/may not be included on final label]
{Items in braces {AAA} are for information purposes and will not appear on final label}

AW35-36

Active Ingredients:

Trichloro-s-Triazinetrione.....	93.5%
Copper sulfate pentahydrate	1.5%
Other Ingredients.....	5.0%
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER [PELIGRO]

Read all precautionary statements and first aid statements before use.

Contamination or improper use may cause fire, explosion or the release of toxic gases. Do not allow product to contact any foreign matter, including other water treatment products. If product is exposed to small amounts of water, it can react violently to produce heat and toxic gases and spatter. Do not add water to this product. Add only into water. {Optional – for use on residential use swimming pool products} [Do not remove floater or other dispensing device from water for an extended period of time if it contains a tablet or tablet residue.] {The following optional statement is for use on residential use swimming pool and spa products.} **[Do not mix this product with a small amount of water. Only add directly to your pool.]** Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed, inhaled, or absorbed through the skin.

{Note to reviewer: Although this product has a "Danger" signal word, as per the EPA label review manual "The Agency may permit reasonable variations in the placement of the First Aid statement as long as the reference statement, "See First Aid (or Statement of Practical Treatment) on (identify appropriate panel)" appears on the front panel." If the First Aid Statements are placed on the front panel of the final graphic label, the statement below will only refer to the Precautionary Statements}

See [left] [right] [side] [back] panel for precautionary and first aid statements.

[Manufactured for] {or} [Sold by]:
Arch Chemicals, Inc.
P.O. Box 724438
Atlanta, GA 31139-1438

NOTIFICATION
Date Received: 8/5/13
Reviewed By: P. Skem

EPA Reg. No. 1258-1342
[Superscript Used in Lot Number]
EPA Est. No. XXXX-YY-ZZ

NET WEIGHT:

5/16

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage. Causes eye and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. Irritating to nose and throat.

- Open in a well-ventilated area. Avoid breathing dust and fumes.
- Do not get in eyes, on skin or on clothing. Wear goggles and rubber gloves. For additional protection of skin, wear long sleeves and long pants.
- Wash hands after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove contaminated clothing and wash clothing before reuse.

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

IN CASE OF EMERGENCY CALL: 1-800-654-6911

PHYSICAL AND CHEMICAL HAZARDS:

DANGER. If product is exposed to small amounts of water, it can react violently to produce heat and toxic gas and spatter. Do not add water to this product. Add only into water.

- [Do not mix this product with a small amount of water. Only add this product directly to your pool.]
{This statement will appear on Pool use labels only.}
- Do not allow to become wet or damp before use.

Can react with other materials, including other water treatment products, to cause fire, explosion, and the release of toxic gases.

- Keep all foreign matter, including other water treatment products, away from this product.
- Use only clean and dry utensils to dispense this product.
- Do not allow this product to contact other water treatment products. If used in a skimmer, make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in a skimmer.
- Avoid spilling this product.

Exposure to heat can cause this product to rapidly decompose, leading to fire, explosion, and the release of toxic gases.

- Store in a cool, dry, well-ventilated area away from heat or open flame.

Strong oxidizing agent. This product can increase fire intensity.

- Keep away from heat and from flame and burning material (like a lighted cigarette).

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{First sentence of paragraph below for containers 50 lb. or less; complete paragraph for all other sizes}

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

{Household/residential use products}

STORAGE AND DISPOSAL:

Pesticide Storage:

Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame.

Pesticide Disposal:

Nonrefillable container. Do not reuse or refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. If not, discard in trash. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING.

EMERGENCY HANDLING: In case of contamination or decomposition – Do not reseal container. Immediately remove container to an open and well-ventilated outdoor area by itself. Flood with large amounts of water. Dispose of the container and any remaining contaminated material in an approved landfill area.

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[AW35-36 or other brand] [tablet[s]*]¹ are a unique and effective pool water sanitizer.] [Routine sanitization is important to keep your pool water free of bacteria and contaminants.] [These convenient and easy to use [BRAND] [chlorinating] [tablet[s]*] are formulated to protect against chlorine loss in direct sunlight, and can be used in skimmers, [and] floaters [and feeders]. [In addition to sanitizing, [brand] [tablets] prevent algae growth and clarify your pool water.] [They are designed to dissolve slowly to provide a steady source of available chlorine.]

[For crystal clear pool water, follow our 4 step pool care program: Step 1: Test and balance pool water, Step 2: Sanitize, Step 3: Shock at least once a week, and Step 4: Add algaecide as directed by that product.]

METHOD OF APPLICATION: Use in a floating dispenser, automatic chlorinator, or feeder designed for this product, or place in skimmer. Use in a new chlorinating device or any device which has previously contained only this product or trichloro-s-triazinetrione. If placed in the skimmer, run the pump a minimum of eight hours daily. **DO NOT** Use in floaters or feeders that have been used with other water treatment products. **DO NOT** Throw tablets directly into pool. **DO NOT** Permit tablets to contact plastic pool linings or metal objects. **DO NOT** Use in any chlorinating device which has been used with other chlorinating compounds.

WATER BALANCE:

[To provide optimum product performance, swimmer comfort and crystal clear water always maintain pH from 7.2 to 7.6, total alkalinity from 80 to 120 parts per million (ppm), and calcium hardness above 200 ppm. Test frequently using an HTH test kit that measures all these ranges. Make any necessary adjustments promptly with the appropriate HTH pool care products. Re-entry into treated pools is prohibited with chlorine levels above 4 ppm for risk of bodily injury.]

{or}

[Adjust and maintain pool water pH from 7.2 to 7.6, total alkalinity from 80 to 120 parts per million (ppm) and calcium hardness above 200 ppm. Test frequently using a[n] [brand] [test kit] [or] [test strips] that measure[s] all of the above ranges. [Bring a pool water sample to your [brand] dealer frequently to test for water balance.] Maintain free available chlorine between 1 - 4 ppm [using a stabilized chlorine product] {or} [brand granular shock].

OPENING YOUR POOL: Balance pool water, shock treat, and stabilize your pool using [brand] Stabilizer & Conditioner and by following directions on that label. Then follow "ROUTINE CHLORINATION" directions.

ROUTINE CHLORINATION:

{For single tablet pack}

Follow "METHOD OF APPLICATION". Add one tablet per 10,000 gallons of pool water every week or as often as needed to maintain a chlorine residual at 1-4 ppm. This dosage may vary depending upon bather load, water temperature and other conditions. Pool must not be entered until the chlorine residual is 1-4 ppm as measured with a reliable test kit.

¹ *The term "tablet[s]" may be replaced with "stick[s]", "capsule[s]", "cube[s]", "cartridge[s]", or other compacted form or descriptive term, either singular or plural, according to each respective product design.

{Directions for use with tablet form of this product in skimmer or floater}

[Ensure that the skimmer basket or floater is free of any other chemicals, tablets, or residue. Place this product in the skimmer basket or floater. Use one tablet per 10,000 gallons of water. Do not add other chemicals to the skimmer or floater while this product is present. Run filter pump a minimum of 8 hours per day, otherwise vinyl liner damage may occur. If free available chlorine goes above 4 ppm, reduce skimmer flow rate or daily pump operation time. Reentry into treated swimming pool is prohibited above levels of 4 ppm free available chlorine due to risk of bodily injury. If chlorine residual goes below 1 ppm, add enough [brand] granular shock to maintain 1-4 ppm of chlorine, and increase skimmer flow rate or daily pump operation time. The number of [tablets*] and frequency of use will vary with bather load, water temperature, rain, and pump operating time.]

{Directions for use with cartridge form of this product in a [brand] feeder}

[Turn off filter pump. Open [brand] feeder, remove cartridge container and allow any water remaining in the empty cartridge to drain back into the feeder. Dispose of empty cartridge material. Refill cartridge container with new [AW35-36 or other brand] cartridge. Replace cartridge container, then close the feeder and turn filter pump back on. Set chlorine delivery rate to maintain available chlorine at 1 – 4 ppm.

After 24 hours check chlorine residual level with a test [kit [or] strip]. If free available chlorine is above 4 ppm, reduce the feed rate and retest in 24 hours. Reentry into treated swimming pools is prohibited above levels of 4 ppm free available chlorine due to risk of bodily injury.

Test chlorine residual on a regular basis, and if below 1 ppm free available chlorine, increase dial setting. Be sure to refill cartridge when contents are fully dissolved.]



{Optional for residential use products} [

]

TO DETERMINE POOL CAPACITY IN U.S. GALLONS Use the appropriate formula below	
POOL SHAPE	FORMULA (Use measurement in feet)
Rectangular:	Length x width x average depth x 7.5 = total gallons
Round:	Diameter x diameter x average depth x 5.9 = total gallons
Oval:	Maximum length x maximum width x average depth x 5.9 = total gallons
Freeform:	Surface area (sq. feet) x average depth x 7.5 = total gallons

{Optional marketing claims for all products}

[Clarifies pool water]

[Precipitating agent included]

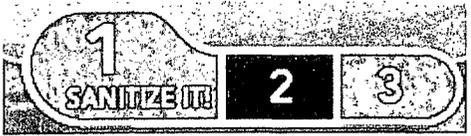
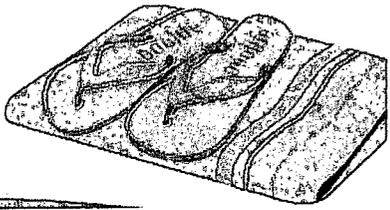
[Assists filtration]

[Multipurpose tablet]
 [Produces sparkling clean swimming pool water]
 [Restores clarity to pool water]
 [Contains a clarifier {or} [filter aid]]
 [Keeps [pool] water clear]
 [Contains clarifying additive]
 [[With] {or} [Contains] built-in clarifier]
 [Keeps pool water clean and crystal clear]
 [Sparkling pool water]
 [For crystal clear, sparkling blue water]
 [4-in-1 Action: Sanitizes, prevents algae, prevents staining & scale formation, and clarifies water]
 [Four products in One]
 [3-in-1 Action: Sanitizes, prevents algae, and clarifies water]
 [Three products in One]
 [[2-in-1] {or} [Dual] Action: Sanitizes and prevents algae]
 [Two products in One]
 [For routine use in automatic feeders, floaters and skimmers]
 [[Provides] 84% available chlorine]
 [Stabilized [Sanitization] {or} [Sanitizer] {or} [Chlorinator]]
 [[Stabilized] {or} [Sun resistant] {or} [Sun [protected {or} protection]] for extended chlorine life]
 [With {or} Contains built-in resistance to sunlight]
 [Sanitizes pool water]
 [Swimming pool sanitizer]
 [Sanitizer [for Chlorine Pools]]
 [Sanitizer for swimming pool water]
 [Concentrated chlorinator for routine use]
 [Multi-action sanitizer]
 [[Multifunctional] {or} [Multi-action] [chlorinating] [tablet]]
 [Protects against bacteria and algae]
 [Kills [bacteria and] [controls] algae]
 [Algaecide]
 [[With] {or} [Contains] built-in algae [protection] {or} [fighter]]
 [Kills bacteria and destroys organic contaminants]
 [Kills and prevents bacteria, while maintaining proper chlorine levels]
 [[Chlorinates] {or} [Chlorine lasts] up to one week]
 [Convenient one week dosage]
 [Convenient to use]
 [Easy, economical, convenient to use]
 [One tablet treats 10,000 gallons [for a week]]
 [Provides long lasting chlorination]
 [Regulates chlorine levels]
 [Totally Soluble]
 [Slow dissolving]
 [Controlled release sanitizer]
 [Individually wrapped for easy handling]
 [For all pool types]
 [Compatible with all pool surfaces]
 [Gentle on Equipment and Liners]
 [For Pop-Up Pools]
 [Step 1: Balance]
 [Step 2: Sanitize]
 [Step 3: Shock]
 [Step 4: Prevent Algae]
 [Step 1 {in the [brand] System}]
 [Leaves no residue]
 [Non-staining formula]

[Will not cause staining]
 [Softens Water] {or} [Water softener]
 [Protection pool surfaces and equipment]
 [Protects pool equipment [against scaling] for longer life]
 [Prevents metal staining [and] [.,] corrosion] [, and scale formation]]
 [Corrosion inhibitor]
 [With built in scale preventative & sunlight protector]
 [Sequestering agent]
 [Reduces scale formation]
 [Enhanced filter performance]
 [New improved {or} advanced formula]
 [Innovative, patented exclusive technology]
 [Test and Add*]{Application frequency per routine maintenance directions.}
 [*Please refer to directions for use]

[[Brand or POOLIFE] 3-Step System]
 {The "[Brand or POOLIFE] 3-Step System" below may be placed on the label to allow easy product identification by consumers.}

[[Brand or POOLIFE] 3-Step System:
 [Step] 1 [Sanitize It!] [POOLIFE [AW35-36 Additional Brand Name]]
 [Step] 2 [Shock It!] [POOLIFE Exclusive Pool Care Collection TurboShock Shock Treatment]
 [Step] 3 [Defend It!] [POOLIFE Exclusive Pool Care Collection Defend +]]



[Sanitizes & Prevents Algae]
 [Prevents Staining & Scaling Formation]
 [Clarifies & Softens Water]

{Optional marketing statements that may be used with pool sanitization with 3 inch tablets.}

[Controlled Release Sanitizer for use in Automatic Feeders or Floaters]
 [Slow Dissolving Sanitizer for use in Automatic Feeders or Floaters]
 [Multifunctional] {or} [Multi-action][3"] [Chlorinating][Tablets]
 [Multifunctional] {or} [Multi-action][3"] [Chlorinating][Tabs]
 [[[3"] Chlorinating Tablets] [with patented exclusive technology]]
 [4-in-1 Action][3"] [Chlorinating][Tabs]
 [3" Sanitizer Tablets]